

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

CASE NO.: 6:24-cv-00172-ADA

TESLA, INC.,

Plaintiff,

v.

THE INDIVIDUALS, PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A,"

Defendants.

/

REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiff, Tesla, Inc. ("Plaintiff"), by and through its undersigned counsel, hereby requests that the Clerk enter default in this matter against the following Defendants who have failed to appear or otherwise respond to the Complaint, as identified on Schedule "A" of the Complaint (Dkt. 3-1):

Def No.	Def. Name
1	87655678
6	AEROFARA-US
7	Aing Store
8	Aishimihan
10	ALBECHE
12	Ameshener
15	ANODAKN
16	Anycars+
17	AofodoDirect
18	AOLEAD US
20	Arkosknight
22	AUFOXI
23	Auggies-US
26	Autobay
28	Avocado Home Life
30	Bejobfun

31	BENLAND
32	Berefose
33	BESTJP01
35	biconghai
36	Bivink
38	BK2023 Direct
39	blue andskies
41	BoxCheer
42	BRCity
43	BS Car
44	Btuptnu-US
47	Car information
49	Carpark
52	CAUZAMARE
53	Ce&Aotufun
57	chengdoumiaotaorendianzishangwuyouxiangongsi
58	chengdouyuhuangminwangluokejiyouxiangongs
65	DAFU DAGUI
66	Dazaione
67	DIXIAOCHUN- AE -PRO
69	dongguanfeifengmaoyi
70	EEK-US
71	Ellen_BestBuy
73	Esuukoo
75	EVBASE
76	EVBOYS
78	Eveaden
79	Everlastko
81	faquxi
82	FENGHAONET
83	FLYPIGEONS
85	Forza Motorsport
86	Friendly Car Home Car Products Franchise Store
87	fulienNA
89	FuQiDianZi
93	gaojiliang
95	GGMMCC
97	GoFarFream
99	GTLAXXX
100	Guangzhou ailingshuo Trading Co., Ltd
101	guowiesen
104	GyeongYeok
106	hailanshangmao-us

107	Hais Direct
108	Haitianxinda
109	HANSSHOW Tesplus
110	Hansshow-tesplus
111	Hefanfaior
114	HNCYHX
115	HONGHAILEY
116	Hongqi New Energy
117	Horry
119	HuaTeng
120	Hui Cheng Ji Accessory
122	HUIOSDEP-US
123	HUZEYFE GULSEN
125	HZGAMER
126	IKITS Direct
127	ILSOCD
128	INCH EMPIRE
129	ISDORE DIRECT
130	ITIY-EU
131	iyunqujiaheho
132	JEBEST
135	JMmaoyi
136	JNSG-US
137	JOTOK
139	Kandich
142	Kenteli
145	KKL-US
146	KMMOTORS
148	KOoOK
149	Kree US
150	Krypland
151	LALKS-US
153	LANFAT
155	LaTough Technology
159	Lejocshee
160	LELEbaihuo
162	lihongqindianpu
163	liquidexiaoshangdian
165	LKWLIKEI
167	LOKONWIS Store
168	LOOMchina
172	Ivehome
173	Madatop

174	Magical Mai
175	Make Life Fun Today
177	Mankaleilab
178	Manran Coop.
179	Martian citizen
180	MAXOAK US
182	MazuKar
185	meixiaoyu
186	MERTER MERTt
187	MetaFrame
190	muge racing-US
194	New Start lee
195	NGHEY-Auto-US
197	niannyang
198	NIUENSY Lcc
201	OEAYZOM
202	OEM KeyCase
203	OMAROV
206	ontto car accessory
207	ounalongNA
208	O-young
209	Ozen Inc
210	PANZI
212	Peak Edge
213	PeiBang Trade
214	PENGHUIHUI-US
218	PLUGOOD
221	PULPEACAY
222	Qeemu
224	Qiahavp-US
225	QingLiDianZi
226	qiuyudedian
228	Qmusen
229	quanjiuwangluokejiyouxiangongsi
233	RIMULA
234	rkcar
236	rongrongshops
237	ROSEIN
239	runhuaxin
240	runxiaoqi
242	SDOROS
243	sdvf-zxvq
245	Senyuer

246	SGREEN
247	Shan Yu Hat
248	shansnao
249	SHITAMEN
252	SIMO Auto
256	SmartSafe official
258	Soroparts
260	Starobkn
261	Storage case
263	SUPERWIN888
264	SVRFGV
265	SYAO-US
266	Sydney Car
267	T&J SHero
268	TAECHU
271	TeahWamny
272	TEISOOL
274	tengjiashangmao
276	Terris store
278	TESFITOO
279	Teslacenter
281	Teslamotors
282	TESMate Store
284	Tomatoman
290	TUTU TECH Direct
291	Ufixed
292	under 9.9\$ store
293	USVOTOV
295	Vabgstu store
298	vipmotoz-us
299	vivicenter
300	VoilaReve
302	Weekeight
303	WeiJinLong123
307	WERKi
308	Weson
314	Wolfcar US
316	WUERSE
318	xiadanle
321	XiBaLong
325	xuezebin
327	YAFENJIE
328	Yaira Jef

330	Yamiedd
332	yanranyixiaohuaping
333	YanYongYanYong
335	YesComTech
336	YI Tai
337	Yida Direct INC
338	Yilaruifa
342	yookoo
343	Yooyatt Direct
349	YUANSHEN
350	YuanWai
351	YuCheng Hat
352	YUKANGDA
353	yxhcar
356	ZEXPARK
357	zhangsmingyin
358	zhangxiaowangluoxiaoshou
360	ZHIDONGZHI
361	ZHKSGLJON
362	Zhongleyuanriyongbaihuo
363	ZMD
364	Zoragoo
365	ZSIS
367	心灵港湾 (aka "Soul Harbor")
368	招宏的小店 (aka "Zhaozhong's shop")

Declaration of A. Robert Weaver in Support of Plaintiff’s Request for Clerk’s Entry of Default (“Weaver Decl.”), at ¶ 6.

At least by May 1, 2024, these defaulting Defendants were served their respective Summons and copies of the Complaint via electronic mail (“e-mail”). Weaver Decl., ¶ 4; Certificate of Service (Dkt. 17). Defendants were also served via website posting. *Id.* Each was pursuant to the Court’s Order (Dkt. 10) granting alternative service.

Only one Defendant, “Autobasis” (Def. No. 25), filed an answer to the Complaint. *See* (Dkt. 52). Plaintiff filed a stipulation of dismissal as to this Defendant. (Dkt. 66). Only one other Defendant, “Slowslog Home” (Def No. 255) was granted an extension to respond to the Complaint.

(Dkt. 31). This Defendant was also dismissed. (Dkt. 57). All other dismissed Defendants have been excluded from this Request for Clerk's Default. Weaver Decl., ¶ 5; *see* (Dkts. 22, 23, 29, 40, 41, 46, 53, 54, 56, 57, and 60-68).

Time allowed for these defaulting Defendants to respond to the Complaint has expired. Defendants' deadline to respond was May 22, 2024. Fed. R. Civ. P. 12(a)(1)(A). Neither Plaintiff nor the Court have granted any defaulting Defendant an extension to respond to the Complaint. *Id.*, ¶¶ 7-8. Plaintiff is informed and believes that none of the defaulting Defendants could be considered infants or incompetent persons. *Id.*, ¶ 9. Plaintiff is informed and believes that the Servicemembers Civil Relief Act does not apply. *Id.*

WHEREFORE, Plaintiff hereby requests that default be entered against the defaulting Defendants identified above.

Date: June 18, 2024

Respectfully submitted by,

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